



**MARTENSON
HASBROUCK
& SIMON LLP**

DEVIN S. COHEN
Attorney at Law
(332) 345-2471 Direct
dcohen@martensonlaw.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 9/13/2022

September 9, 2022

Via ECF

Hon. Analisa Torres
United States District Judge
U.S. District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Paul v. Universal Protection Service, LLC, et al.*,
Case 1:22-cv-06566-AT

Judge Torres:

This firm represents Defendant Universal Protection Service, LLC d/b/a Allied Universal Security Services ("Allied Universal") in the above-captioned matter. This letter is being submitted jointly on behalf of Plaintiff and Allied Universal. Pursuant to Rule I(B) of Your Honor's Individual Practices in Civil Cases, we write to request that the Court stay this action pending arbitration of Plaintiff's claims.

On August 2, 2022, Plaintiff filed an employment discrimination complaint against Allied Universal and four individual defendants,¹ alleging, *inter alia*, violations of federal (Title VII), state (NYSHRL), and city (NYCHRL) anti-discrimination laws. On August 30, 2022, Allied Universal filed a letter motion for an extension of time to respond to the Complaint as the parties were engaged in ongoing discussions of potential motions, including a motion to compel arbitration. [ECF No. 20.] On August 31, 2022, the Court granted Allied Universal's request. [ECF No. 21.] Counsel for Plaintiff and counsel for Allied Universal have conferred and agree that all claims asserted in the Complaint are subject to arbitration. Plaintiff and Allied Universal will pursue arbitration. Accordingly, we respectfully request that the Court stay this action in its entirety pending arbitration of Plaintiff's claims.

We thank the Court for its time and consideration.

Sincerely yours,


MARTENSON, HASBROUCK & SIMON LLP

/s/ Devin S. Cohen
Devin S. Cohen

GRANTED. The action is STAYED until
further order of the Court.

SO ORDERED.

Dated: September 13, 2022
New York, New York



ANALISA TORRES
United States District Judge